

EXHIBIT A

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Attorneys for Defendants
UBER TECHNOLOGIES, INC.;
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF SHYROSE
RAZWANI**

This Document Relates to:

ALL ACTIONS

Judge: Hon. Lisa J. Cisneros
Courtroom: G – 15th Floor

1 I, Shyrose Razwani having personal knowledge of the following state:

2 1. I have attained the age of eighteen years old.

3 2. I am an employee of Uber Technologies, Inc., (“Uber”), and I am the Head of Platform
4 Access for the United States, a position on the Safety Team I have held for more than two years.

5 3. My job responsibilities include managing the US Safety Team responsible for creating
6 and implementing safety and fraud controls for onboarding drivers to the Uber App. This specifically
7 includes safety protocols related to screening the criminal and driving histories of potential and current
8 drivers.

9 4. Uber is committed to safety, from the creation of new standards to the development of
10 technology with the aim of reducing incidents. Uber values safety and requires background checks for
11 every driver, whether required by regulations or not. Uber also uses technology to supplement its
12 background checks.

13 5. Uber operates in a highly competitive industry. Protecting its proprietary information,
14 including trade secrets, algorithms, and business strategies, is essential to maintaining Uber’s
15 competitive edge. Unauthorized disclosure or access to this information could compromise Uber’s
16 market position and hinder its ability to innovate.

17 6. As a global entity, Uber is subject to various legal and regulatory requirements
18 regarding data protection and privacy. Compliance with these regulations is not only a legal obligation
19 but also a testament to Uber’s commitment to ethical business practices. Ensuring the confidentiality
20 and integrity of sensitive information helps Uber meet these obligations and avoid potential legal and
21 financial repercussions.

2. Uber and Checkr have had business dealings related to background check services since
2014.

1 8. Checkr provides criminal background checks, motor vehicle reports, and screening
2 services through an online platform. To enable these services, Uber and Checkr have each provided
3 significant proprietary information (including technical data) on their respective platforms.

4 9. That technical data includes Uber's highly confidential, proprietary, and privileged
5 adjudication protocols and standards. These driver eligibility standards are the result of more than a
6 decade of business learnings, which cost Uber significantly to develop. These standards are also based
7 on years of legal advice regarding consumer reporting laws, state and local regulations for ride-sharing
8 and transportation network services, and state laws governing the fair and transparent use of public
9 records data.

10 10. That technical data also includes supply chain and workflow processes that are highly
11 proprietary and specialized to Uber's unique and dynamic earning offerings to drivers. Should the
12 information about Uber's workflow and services be disclosed, Uber would be at a significant
13 competitive disadvantage as Uber's continued and significant investments would be disclosed to all
14 of its competitors to replicate for free.

15 11. Uber takes steps to strictly limit the number of its employees that have access to this
16 information and only permits those who need to access it for a legitimate business purpose to do so.

17 12. Likewise, Uber's agreement with Checkr prohibits Checkr from disclosing Uber's
18 confidential information to third parties in any way except as necessary to perform the tasks required
19 under the agreement.


20 13. Any affiliates that Checkr uses to perform work must have a business purpose and sign
21 a confidentiality agreement before accessing Uber's confidential information.

 14. Confidential information includes all Uber app designs, capabilities, specifications,
drawings, program code, software (in various stages of development), agreement terms, financial and
pricing information, business and marketing plans, actual and potential customers and suppliers, other
similar proprietary information.

1 15. The agreement also provides that any work product (and intellectual property rights
2 arising from that work product) conveys to Uber.

3 I declare under penalty of perjury under the laws of the United States of America that the
4 foregoing is true and correct.

5 Executed on June 7, 2024.

6 
7 _____
8 Shyrose Razwani